PLEASE TAKE NOTICE THAT, upon the memorandum of law and the accompanying Declaration of Eric M. Creizman, with exhibits, Defendant Ilya Petrov will move this Court before The Honorable Laura Taylor Swain, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an order granting Petrov's pretrial motions: (i) for a severance under Fed. R. Crim. P. 14(a) and (ii) to suppress his post-arrest statements, which were elicited in violation of his *Miranda* rights.

Dated: New York, New York

May 15, 2015

/s/ Eric M. Creizman

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